

EXHIBIT B

From: [John Quinn](#)
To: Jessica.StebbinsBina@lw.com
Cc: [Roberta Kaplan](#); [Alexander Rodney](#); [Andrew G. Celli, Jr.](#); [Andrew Wilson](#)
Subject: Doe v. Trump: MGM Subpoena Response
Date: Wednesday, October 23, 2019 3:57:30 PM

Dear Jessica:

Thanks for the call today. As discussed, we were disappointed that MGM did not have, following multiple extensions and prior discussions, a specific counter-proposal with respect to categories of responsive documents that it would agree to produce on a priority basis, as well as additional responsive documents that it would be prepared to produce on a non-priority basis. As we've emphasized, discovery is underway, MGM is in receipt of a valid subpoena, and the Court has denied Defendants' repeated requests for a stay. MGM is not permitted to unilaterally grant itself such a stay. At this point, given the lack of progress, we think the only sensible way forward is for MGM to provide its written responses on Friday and we'll assess appropriate next steps from there. To clarify one point we raised on the call: we are prepared to cover your costs in connection with production, so there shouldn't be any basis for an objection on the grounds of cost or burden.

Best regards,
John

John Quinn | Kaplan Hecker & Fink LLP
350 Fifth Avenue | Suite 7110
New York, New York 10118
(W) 212.763.0886
(M) 610.952.4726
jquinn@kaplanhecker.com